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Abbreviations

CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
ECP	Employee Concerns Program
OSHA	Occupational Safety and Health Administration
RL	Richland Operations Office
TWRS	Tank Waste Remediation System

1. Introduction

This ~~procedure~~program document describes the structure, policies, ~~responsibilities, and activities of the Tank Waste Remediation System (TWRS) Privatization~~and responsibilities of the River Protection Project Waste Treatment Plant (RPP-WTP) Project Employee Concerns Program (ECP) ~~and provides instructions for its implementation and use.~~ This program applies to employee concerns ~~in the areas of environmental, safety, health~~of a safety, health, and environmental nature.

This program does not cover equal employment opportunity, sexual harassment, or other work place concerns not associated with safety, health, and the environment. BNFL Inc. has ~~well-developed~~ programs to address these other areas of concern. For such concerns, employees can refer to the BNFL ~~Standards of Conduct~~Inc. procedures.

The RPP-WTP Project ECP supports the employee's right to bring unresolved issues or concerns to the attention of management at any level within their own employment entity/organization ~~structure.~~structure. Employees are encouraged to first use the issue resolution methods identified in internal procedures; however, external organizations that are available for ~~Appendix A depicts potential resolution paths for employee concerns. In addition to using the ECP, employees may also take concerns directly to the U.S. Department of Energy (DOE) Richland Operations Office (RL) Tank Waste Remediation System (TWRS) Regulatory Unit's Employee Concerns Program or to other government agencies. The process for addressing concerns to outside organizations is described in Appendix B.~~reporting concerns are also identified in those procedures for use of RPP-WTP Project employees.

The ECP has been designed to apply throughout the ~~TWRS Privatization~~RPP-WTP Project life cycle: design, construction, operation, and deactivation. The ECP is intended for the use of both direct ~~Project~~project employees and subcontractor employees and ~~has as its basis, the DOE ECP policy established in RLID 5480.29, RL Employee Concern Program.~~is consistent with the contract with the U.S. Department of Energy (-DOE). [T1]

2. Policy

The ~~TWRS Privatization Project~~RPP-WTP Project senior management and organization are committed to open, two-way communication with ~~a~~all employees, including subcontractor employees. Employees are encouraged to promptly report concerns regarding safety, health, environmental protection, compliance with laws and regulations, quality, fraud, waste, or mismanagement of government resources, ~~reprisals, or working conditions to their supervisor or the appropriate service organization~~or reprisals through normal project processes. These processes include dialogue between employees and management, or referral to service organizations (Safety or Human Resources, for example). The RPP-WTP Project senior management and organization endorse and encourage participation in the ECP if normal methods have not ~~All concerns are important and are handled in a similar manner through the ECP process. Employees are~~effectively addressed an employee's concern. Employees are also encouraged to identify ~~near miss~~near miss and non-consequential events to ensure that ~~each opportunity~~opportunities for improved operations ~~is~~are considered.

~~Project Managers are responsible for establishing a work climate that encourages free flow of communication between employees and managers. If employees are uncomfortable discussing an issue~~

~~with members of their management chain, this program provides other paths for issue identification (including discussion with other managers within the work group, within company service groups, or at upper levels of management). Managers are expected to listen intently, sensitively, and receptively, and to investigate and take appropriate responsive actions, if any, in an effective, timely manner. They also have the responsibility to seek help from upper management or other sources with the needed expertise or authority to resolve a concern. Managers are responsible for discussing delays in resolution with the employees reporting concerns as well as the basis for each appropriate responsive action, if any.~~ Management is committed to prompt resolution of concerns. However, if the employee either believes normal methods have not been effective or does not wish to use normal methods, the employee can go directly to the RPP-WTP Project ECP that has been designed to supplement the normal project processes, programs, or systems for identifying and dealing with safety, health, and environmental concerns. All concerns reported to the ECP are important and will be handled in a similar manner through the ECP process. The ECP cannot, however, be used to replace the grievance process that is in place for bargaining unit personnel, although the project reserves the right at all times to investigate claims of fraud or other serious mismanagement. Confidentiality and anonymity (as required) will be observed.

Freedom of expression cannot co-exist with fear of reprisal. For the ~~TWRS Privatization project,~~ RPP-WTP Project, no employee who identifies a concern will be subjected to any form of reprisal ~~or retribution~~ [T2] that violates the ~~protected~~ provisions ~~as described in 29 CFR 24. These forms of reprisal include intimidation, threats, restraint, coercion, blacklisting, dismissal, or any other manner of employee discriminating against an employee based on protected conduct.~~ 24 or 10 CFR 708. Any project employee, including supervisors and managers, who engages in reprisal in response to an employee concern shall be subject to disciplinary action which may include discharge.

This policy information is provided to employees in mandatory ECP [T3] training. During ECP training, RPP-WTP Project senior management endorses and encourages participation in the ECP.

3. Employee Concern Program Description

~~The TWRS Privatization Project ECP is intended to supplement, rather than replace, the normal company processes, programs, or systems for identifying and dealing with concerns. These normal company processes include dialogue between employees and management or referral to service organizations. Employees are encouraged to use the normal company processes to resolve concerns in preference to the ECP. If the employee either believes normal methods have not been effective or does not wish to use normal methods, the employee can go directly to the ECP. The ECP cannot be used to replace the grievance process that is in place for bargaining unit personnel, although the company reserves the right at all times to investigate claims of fraud or other serious mismanagement. Appendix A contains a flow chart of the ECP.~~

3.1. Procedures

~~The procedures developed for the TWRS Privatization Project ECP address (1) the initiation of an employee concern, and (2) the investigation and appropriate corrective action, if any, of an employee concern. Appendix A provides a graphical representation of the employee concern resolution process.~~

3. Definitions

<u>Employee Concern</u>	<u>A good faith expression by an employee that a policy or practice of BNFLRPP- WTP contractors, Inc., DOE, or one of the other contractors or subcontractors should be improved, modified, or terminated. Concerns can address issues such as safety, health, the environment, management practices, fraud, waste, or reprisal for raising a concern.</u>
<u>Imminent Danger Condition/-Concern</u>	<u>Any condition or practice in any workplace that creates a danger that could reasonably be expected to cause death or serious physical harm immediately or before the onset of such danger could be eliminated through the normal procedural mechanism.</u>

4. Employee Concerns Program Structure

The ECP is directed by the Employee Concerns Program Officer and administered by the Employee Concerns Program Coordinator and provides processes for employees to initiate concerns and for the investigation and resolution of those concerns. Procedures address reporting, investigating, and resolving concerns.

4.1. Employee Concerns Program Officer and Coordinator

The ECP Officer and Coordinator duties are regarded as high priority. Management will support the performance of these duties by 1) recognizing and supporting the need to keep employee concern information confidential, and 2) providing office facilities which allow ready access by concerned employees, privacy for discussions, and secure records storage.

4.2. Initiating a Concern

~~As shown in the following procedures and in Appendix A, employees are encouraged to first seek to resolve concerns by working with their supervisor or their appropriate service organization (e.g., Safety or Human Resources). Employees can identify an issue they want resolved through the ECP by contacting any manager, their local ECP Coordinator, or the Project ECP Officer in writing or by telephone. At any stage of the concern resolution process, an employee may elevate the concern to more senior levels of management or to DOE. Appendix B contains the telephone number for DOE, Occupational Safety and Health Administration (OSHA), and Hanford Cleanup Hotline.~~

Employees [T4] should be advised that they are not obligated to express their concern to project personnel prior to notification of the Regulatory Unit (RU) ~~RU~~, other authorized Government agency that could

~~If the employee desires, he/she may submit a concern anonymously. The local ECP representative will use the information available to have anonymous concerns investigated to the degree appropriate to the significance and urgency of the concern, recognizing that concerns are often more difficult to resolve without discussion with the person making the complaint. The employee making the anonymous concern may contact the local ECP representative by telephone to learn of actions taken to resolve the anonymous concern.~~

~~A supervisor who receives an employee concern is responsible to promptly evaluate the concern and categorize it either as representing: (1) an immediate threat to health, safety, quality, or the environment or~~

~~a continuing case of misconduct (and therefore warranting immediate identification and implementation of appropriate corrective actions to the extent possible); (2) an event requiring a report to regulatory agencies; or (3) a problem of lesser significance (and therefore warranting routine analysis and resolution as described in the following). These criteria are the only categories utilized for prioritizing employee concerns and subsequent corrective actions. Any recipient of an employee concern that involves an immediate threat to health, safety, quality, or environment, or a continuing case of misconduct may take immediate appropriate corrective action.~~ receive employee concerns, or any other avenue of expression.

An Employee may include his/her/their name with the concern but ask that his/her/their name be kept in confidence. The employee's desire for confidentiality will be honored unless, in the judgment of senior project management or the Project ECP Officer, keeping this confidence would seriously jeopardize safety, quality, environmental protection, or compliance with laws or DOE regulations. However, before an employee's name is used when confidentiality has been requested and agreed upon, the employee will be notified and the employee's name will only be made available to personnel with a valid need-to-know. If the employee informs the ECP Officer that confidentiality is required regardless of the circumstances surrounding the concern, the ECP Officer shall pursue the issue with the RPP-WTP Project legal staff.

3.1.1. Initiating an Employee Concern

- | | | |
|---------------------------------|----|---|
| Employee | 1. | In using the ECP to resolve a concern, contact the ECP Officer, ECP Coordinator assigned to your work location, or any manager to describe your concern. You can submit your concern verbally, via the Project Employee Concerns Coordinator, Lois Bender [(703) 218 4471] during Phase IA and the Project Employee Concern HOTLINE during Phase IB; or you may use the <i>Employee Concern Form</i> (Appendix C), which is available from the local ECP representative or from Project bulletin boards. |
| Recipient | 2. | When you learn of a concern that an employee wants addressed through the ECP, take the following actions: <ul style="list-style-type: none">i. If an Employee Concern Form has not been previously initiated, initiate the form.ii. Contact the originating employee to clarify the issue(s) as needed and have employee verify and agree to the substance and nature of the issue(s).iii. Summarize the discussion, length of discussion, and any other pertinent information.iv. Determine whether immediate action must be taken and identify the notifications that must be made relative to safety, quality, or environmental protection (refer to Section 4.0 of this procedure).v. Immediately forward a copy of the Employee Concern Form to the local ECP coordinator. |
| ECP Coordinator/
ECP Officer | 3. | Within five working days acknowledge receipt of the concern to the originating employee (if known) and clarify if the employee desires confidentiality and is willing to assist in resolution of the concern. |
| | 4. | Assign a Concern Investigator who can conduct the investigation and initiate appropriate corrective action, if any, in an independent and objective manner. |
| | 5. | Initiate an employee concern file for each concern. |

3.1.2. Resolving an Employee Concern

The investigation of an employee concern is conducted by a concern investigator, who may be a manager, service organization representative, or a subject matter expert. Guidelines for the conduct of investigations are listed in Appendix D.

- | | | |
|---------------------------------|----|---|
| Concern | 1. | Initiate any investigation required (refer to the guidance Investigator on performing concern investigations contained in Appendix D). Identify the information necessary to determine if any corrective action is necessary and appropriate. Gather information as required and prepare a short report. |
| | 2. | Within 15 working days of receiving the concern, provide a status report to the local ECP Coordinator and the ECP Officer. |
| | 3. | As soon as possible (and within 30 days of receiving the concern unless unusual circumstances require further work beyond 30 days), complete investigative activities, complete concern resolution actions or develop a resolution plan, and report results and actions taken/planned to the local ECP Coordinator and to the Project ECP Officer. |
| ECP Coordinator/
ECP Officer | 4. | Until the investigation has been completed, the ECP representative must contact the employee at least once a month to discuss progress in the investigation. |
| | 5. | When an appropriate corrective action is taken, the ECP representative must contact the employee within 10 working days and close out the Employee Concern Form with the employee. The ECP representative then forwards a copy of the concern to the Project ECP Officer in Richland, Washington. |

3.2. Employee Concerns Program Officer

The ECP is directed by the Employee Concern Program Officer, who is responsible for taking necessary actions to ensure its success. Each of the cooperating companies working on the TWRS Privatization Project shall identify their own ECP officer. These actions include informing employees of their rights to raise issues, implementing the administrative controls to support the program, training managers on implementation of the program, and ensuring the ECP policies and practices conform to DOE directives. During Phase IB of the TWRS Privatization Project, the ECP Officer will be assisted by ECP Coordinators, who are responsible for assisting employees, local line management, and the Project ECP Officer in implementation of the ECP. A list identifying the ECP Officer and Coordinators and their locations is found in Appendix E.

Specific responsibilities of the ECP Officer are as follows:

- ~~—Ensure that concerns raised using the ECP are promptly and thoroughly evaluated.~~
- ~~—Ensure that appropriate action plans for resolution of concerns are promptly formulated and implemented.~~
- ~~—Ensure that employees raising concerns who disclose such receive adequate communication on the investigation and appropriate corrective action, if any.~~
- ~~—Ensure compliance with an employee's desire for confidentiality unless overridden by the need to fully investigate the matter or by safety or legal compliance obligations, in which case, the employee will be notified in advance of such an action.~~

- ~~—Work with line management to ensure that a Concern Investigator, who can investigate and resolve a concern in an independent, objective manner, is assigned to each concern.~~
- ~~—Manage the ECP and maintain its records. Assure that ECP records contain the completed Employee Concern Form and other information relative to the investigation and resolution of each concern and that records are protected from unauthorized access.~~
- ~~—Ensure that information is provided to all employees about the ECP policy and procedures, including maintaining bulletin board information on the ECP.~~
- ~~—Review each employee concern submitted by a bargaining unit employee to determine whether the concern is covered by the bargaining unit contract or labor law.~~
- ~~—Conduct a continuing analysis of employee concerns to identify repeat of generic issues.~~
- ~~—Communicate to the BNFL TWRS Privatization Team upper levels of management and, as necessary, the DOE or other agencies with jurisdiction, significant information regarding safety, regulatory compliance, and operational effectiveness revealed by employee concerns.~~

~~Issue a quarterly report to the TWRS Privatization Project Manager and DOE RL Employee Concerns Program Manager summarizing significant ECP issues (maintaining confidentiality), overall statistical information, and program enhancements.~~

~~Specific responsibilities of the ECP Coordinators are to follow a concern through the investigative process and to take appropriate corrective action, if any, and ensure that written records are maintained on the concern, the actions taken to investigate it, and the appropriate corrective actions, if any. The ECP Coordinators are assigned to the Project ECP Officer in their assigned work locations and perform various duties, including training employees and management on the ECP, informing employees of the progress on the investigation of their concerns, and ensuring that the time line for addressing concerns is tracked and contacts are recorded.~~

4.Immediate Action Determination

~~Managers, including the ECP Officer, who receive employee concerns need to evaluate whether these concerns require additional management action beyond routine evaluation as an employee concern. The intent of this further evaluation is to ensure that concerns representing potential threats to the health and safety of Project personnel, the public, or involve threats to the environment, are responded to in an expeditious manner. These evaluations should also identify presently on-going deficiencies or misconduct that could lead to more significant problems, and therefore warrant immediate correction (e.g., continuation of operations in the face of inoperable or deficient monitoring of environmental, safety, and health equipment). These evaluations should be performed in conjunction with responsible line management and may involve the Safety Manager, the Environmental Compliance Officer, the legal staff, or the Human Resources Manager, as appropriate. Examples of additional management actions include stop work orders, actions requiring immediate reporting to DOE or other officials, and problem report issuance.~~If the employee desires, a concern may be submitted anonymously. The ECP representative will use the information available to have anonymous concerns investigated to the degree appropriate to the significance and urgency of the concern, recognizing that concerns are often more difficult to resolve without discussion with the person making the complaint. The employee making the anonymous concern may contact the ECP Officer or Coordinator by telephone to learn of actions taken to resolve the anonymous concern.

4.3. Investigation and Corrective Action

After an employee has submitted a concern, the concern is categorized as: (1) an imminent danger or immediate threat to health, safety, quality, or the environment or a continuing case of misconduct; (2) an event requiring a report to regulatory agencies; or (3) a problem of lesser significance. The potential for or presence of significant impact or imminent danger shall be the first consideration in evaluating an employee concern, followed by timely, appropriate investigation and action (which may include notification of project management). The employee should receive acknowledgement of the receipt and [T5] categorization of the concern within 5 working days and resolution of the concern within 30 working days.

Unless [T6] otherwise agreed to by the employee, an organization other than that of the employee's immediate supervisor should conduct the investigation. Similarly, the individuals or organizations outside the concerned employee's organization should not be selected to conduct the investigation where their involvement presents a conflict of interest.

The investigator may use techniques such as root cause analysis to assure that core issues have been identified during the investigations. Guidance [T7] for conducting investigations and for extensions of recommended timeframes are included in procedures. [T8] A written record of the concern, information obtained during the investigation process, contact with the concerned employee, and actions taken to resolve the concern will be kept in a secure environment, ~~as a QA record~~. Employees will be kept informed of the progress of the investigation and any corrective action relating to the concern.

Concerns that are not related to safety, health, or environmental areas (e.g., employee relations, company policy, or labor relations) will be referred to the appropriate manager for response.

4.4. Records and Reporting Requirements

As [T9] a minimum, the ECP Officer ~~office~~ will maintain the following records:

- (a) concern log,
- (b) concern report
- (c) investigation and resolution summaries
- (d) results of management assessment of the ECP.

The ECP Officer will provide quarterly reports to the RPP-WTP General Manager and to the DOE—RU Safety [T10] Allegations Program Coordinator (or other DOE official identified as the primary DOE point of contact). The report will [T11] address the following:

- (a) the concerns activity levels for the period
- (b) nature of the concerns
- (c) resolution of the concerns
- (d) program enhancements
- (e) if changes are made in the ECP Coordinator or Officer assignment, the name, title, and phone number of the new appointee

The report will be prepared in a manner that provides confidentiality to employees ~~that~~ who have submitted concerns.

The ECP ~~officer~~ Officer will also report progress and corrective actions, if any, to employees ~~that~~who have submitted concerns. The report does not have to be a written report.

5. Employee Concerns Program Participant Responsibilities

5.1. ECP Staff

The ECP Officer and Coordinator(s) will be nominated by senior management and will be chosen in accordance with the qualification standards prescribed by management in procedures. The ECP Coordinator(s) will assist the ECP Officer in administration of the ECP. Guidance and specific responsibilities of the ECP Officer and Coordinator(s) are contained in procedures.

The ECP Officer is responsible for taking necessary actions to ensure the program's success. These actions include:

1. informing employees of their rights to raise issues;
2. providing workplace [T12]postings and program brochures to include information such as legally-required notifications and phone numbers of individuals or organizations employees may contact;
3. establishing [T13]procedures describing methods and processes used to implement ~~project~~ program requirements;
4. ~~e~~[T14]establishing a 24-hour telephone capability for easy access and timely reporting of concerns;
5. ensuring that concerns are investigated and resolved in a timely manner and [T15]that mechanisms exist to assure confidentiality;
6. establishing criteria for investigation and resolution of concerns;
7. selecting appropriate~~ly~~ senior and experienced investigators;
8. ensuring [T16]that the concern has been investigated and that core issues identified have been corrected and confirmed to management (e.g., entry of the issue into the corrective action program);
9. referring [T17]or reporting concerns to DOE or other agencies as required by regulations;
10. implementing the administrative controls to support the program;
11. developing effective program training that provides senior management endorsement of the ECP;
12. submitting reports, including [T18]those required to applicable regulatory agencies.; and
13. ensuring the ECP policies and practices conform to the authorization basis.

~~The ECP Officer will be assisted by the ECP Coordinator(s) in administration of the ECP. Guidance and specific responsibilities of the ECP Officer and Coordinator(s) are contained in procedures.~~

5.2. RPP-WTP Project Organization Managers

RPP-WTP Project managers and supervisors are responsible for establishing a work climate that encourages free flow of communication between employees and managers. If employees are uncomfortable discussing an issue with members of their management chain, this program provides other paths for issue identification (including discussion with other managers within the work group, within company service groups, or at upper levels of management). Managers are expected to listen, to promptly evaluate the presence of or potential for imminent danger; and to investigate and take appropriate responsive actions, if any, in an effective, timely manner. They also have the responsibility to seek help from upper management or other sources with the needed expertise or authority to resolve a concern. Managers are responsible for discussing delays in resolution with the employees reporting concerns as well as the basis for each appropriate responsive action, if any. Managers are also responsible for ensuring that each employee under their direction receives ECP training that has been established by the RPP-WTP Project training group.

5.3. RPP-WTP Project Organization Employees

Employees are responsible for ensuring that they understand and are able to apply the training they receive regarding the ECP. Employees are further encouraged to exercise their responsibility for reporting concerns of a safety, health, or environmental nature. Should the employee choose to report a concern anonymously, the employee may [T19]periodically contact the ECP staff to learn the status of the concern.

6. References

1. 10 CFR 708, *Contractor Employee Protection Program*
2. 29 CFR 24, *Procedures for the Handling of Discrimination Complaints Under Federal Employee Protection Statutes*

~~DOE 5480.29, *Employee Concern Management System*~~

~~RLID 5480.29, *RL Employee Concerns Program*~~

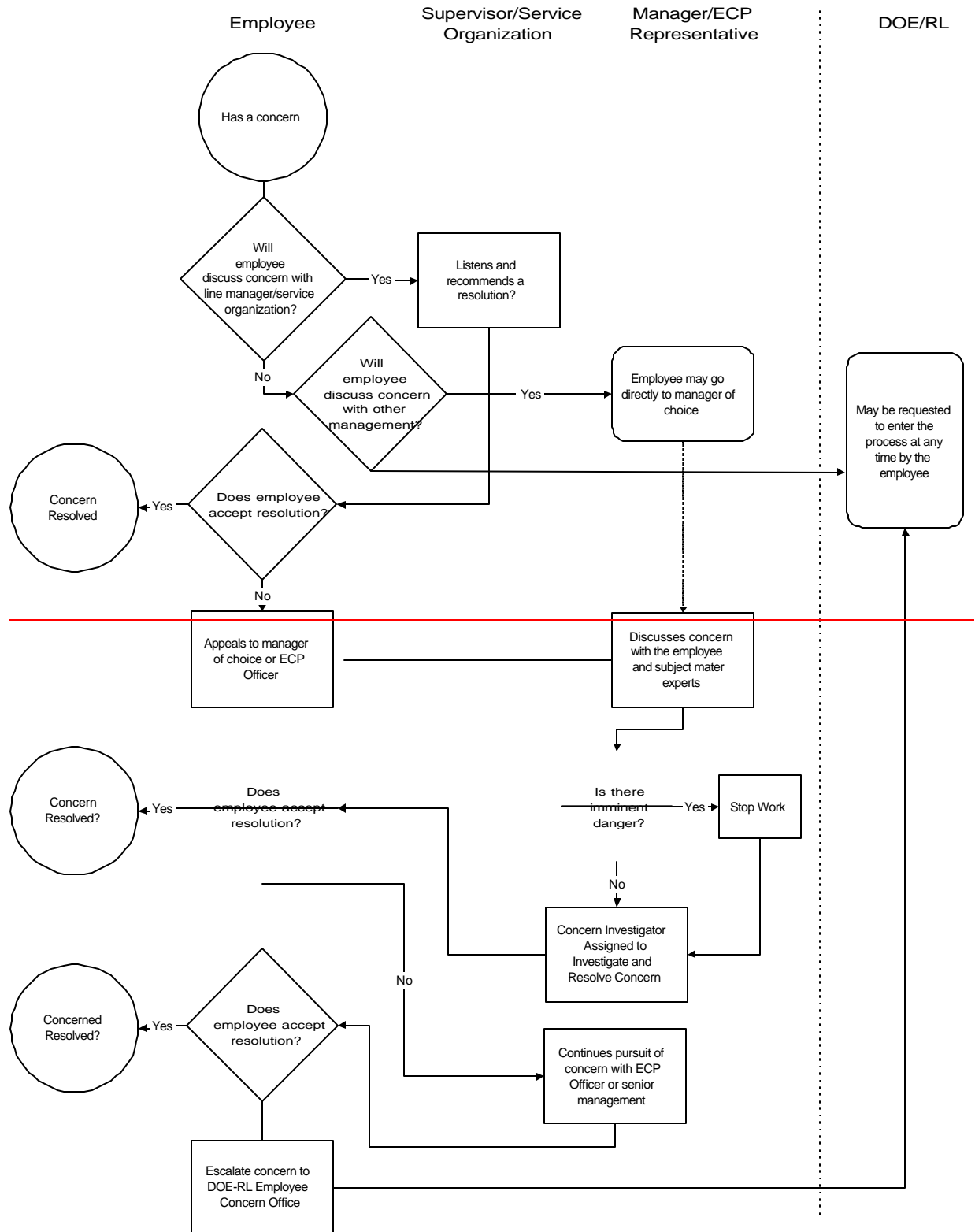
~~RL/REG 96-03 (Rev. 0), *Guidance for Review of TWRS Privatization Contractor Employee Concerns Management System*~~

A

~~Appendix A~~

~~Employee Concern Resolution Process~~

Employee Concern Resolution Process



Appendix B

Reporting to Outside Organizations

The TWRS Privatization Project has developed several internal methods for addressing employee concerns. Employees and subcontractors are encouraged to report their concerns using these processes. However, employees also have the right to escalate their concerns to DOE under the DOE Contractor Employee Protection Program when they disagree with internal investigations and responsive action, if any, are concerned about reprisals, or as otherwise appropriate. The following information is provided to inform employees and subcontractors of the phone numbers and addresses of DOE organizations designated to respond to DOE contractor concerns;

Concerns regarding occupational safety or health should be reported to the Washington Industrial Safety and Health Administration or the United States Occupational Safety and Health Administration [(800) 231-OSHA or 231-6427].

- Concerns regarding environmental protection should be reported to the Washington Department of Ecology's Hanford Cleanup Hotline [(800) 321-2008].
- Concerns regarding radiological, nuclear, and process safety should be reported to the TWRS Regulatory Unit Employee Concerns Coordinator, Mr. Neil K. Hunemuller [(509) 376-6727]. During Phase IA this line will be available during normal working hours Monday through Friday.
- Employees who believe they have suffered retaliation as a result of raising a safety concern should report the matter to the TWRS Regulatory Unit Employee Concerns Coordinator, Mr. Neil K. Hunemuller [(509) 376-6727]. Following evaluation for the radiological or nuclear safety significance of the concern the employee will be referred either:
 - i. to the Occupational Safety and Health Administration who investigates such claims for all of private industry under 29 CFR 24 or
 - ii. to the DOE Inspector General for investigation under 10 CFR 708 if the conditions for applicability of that regulations are involved.
- Employees with a concern alleging fraud, waste, or mismanagement of government resources may address their concern to the DOE Inspector General Hotline [(800) 541-1625].

~~Appendix C~~

~~Employee Concerns Reporting Form~~

~~The Employee Concerns Reporting Form appears on the following two pages.~~

TWRS-P ***EMPLOYEE CONCERN***

Concern Number _____

Page 1

(OPTIONAL) Employee Name _____ Phone/MSIN _____/_____

Company _____

~~Yes~~ ~~No~~ Confidentiality requested? ~~Date~~ _____

~~Yes~~ ~~No~~ Willing to assist in actions to resolve this concern?

~~CONCERN DESCRIPTION~~ ~~PROPOSED RESOLUTION~~

Received & Acknowledged By _____

Div./Dept. _____ Date _____

E.C.P. Officer _____ Date _____

Action Assigned to _____

Div./Dept. _____ Date _____

INSTRUCTIONS

EMPLOYEE

Any TWRS Privatization Project employee may express a concern about safety, security, quality, environmental protection, wrongdoing, or working conditions by using this Employee Concern (EC) form, or by visiting or phoning the Employee Concerns Program Officer (24 HOUR HOTLINE _____). Instructions for using this form follow:

- ~~1. NAME, PHONE, MSIN: You need not identify yourself. However, concerns are often difficult to resolve without discussion. You may phone the person to whom you are sending this form to discuss it without identifying yourself.~~
- ~~2. CONFIDENTIALITY/WILLINGNESS TO ASSIST: Indicate your desire for confidentiality and your willingness to assist the Concern Investigator in seeking resolution of the concern.~~
- ~~3. DESCRIPTION: Be specific and include important information, such as witnesses, actions, times of events, equipment, documents, etc. Indicate any imminent danger that you recognize. You may suggest a resolution.~~
- ~~4. SUBMITTAL: Send this EC form to the Employee Concerns Program (ECP) Officer at MSIN: _____, or any TWRS Privatization Project manager of your choice.~~

RECEIVING PERSON

- ~~1. Evaluate the concern immediately to identify the possibility of imminent danger to staff, the public or the environment. Contact the concern originator, if identified, within five working days to discuss the concern, any confidentiality desires, and willingness to participate in actions to resolve the concern. Note this acknowledgment above, add any supplemental information, and send a copy of the EC to the ECP Officer at MSIN: _____.~~

EMPLOYEE CONCERNS PROGRAM OFFICER:

~~Have a concern investigator assigned to resolve the concern; monitor resolution progress; keep the concerned employee informed; and provide the concerned employee with feedback on the final response to the concern.~~

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~~TWRS-P~~ ~~EMPLOYEE CONCERN~~

Concern Number

Page 2

~~SUPPLEMENTAL INFORMATION AND RESOLUTION SUMMARY:~~

~~CLOSURE WHEN FEEDBACK IS COMPLETE:~~

Action(s) Complete _____

Phone/MSIN _____ / _____ Date _____

_____ Date _____ Employee agrees that actions and
~~Employee Acknowledges Feedback~~ feedback were responsive to
concern.

~~Yes~~ ~~No~~

Employee Initial

_____ Date _____
~~ECP Manager Completes Closure~~

~~EMPLOYEE COMMENTS AT CLOSURE:~~

~~K12F001 10/22/98~~

Appendix D

Guidelines for Employee Concern Investigations

~~It is important to identify all facts surrounding an issue identified as an employee concern. A problem well defined is half solved. Managers and concern investigators should confer with company counsel early in the concern process for guidance on confidentiality and privileged issues. The following information should be reviewed by managers and concern investigators as data is gathered to resolve a particular concern.~~

- ~~—Describe the condition, location, and nature of the problem.~~
- ~~—Identify any laws, regulations, codes, licenses, and safety or analytical basis that apply to the activities identified in the concern. Include any allegations of failure to comply with these requirements.~~
- ~~—Identify any structures, systems, or components vital to safety or program performance that allegedly do to not conform to stated criteria or that allegedly cannot perform their intended function.~~
- ~~—Identify any written material (drawings, records, data sheets, etc.) that include pertinent information relative to the identified concern. Also identify documentation initiated as a result of the concern (Engineering Change Notices, Job Safety Analyses, Work Orders, procedure changes, etc.).~~
- ~~—Describe the work being performed. Include a description of the equipment being used (type, condition, etc.), materials and chemicals involved, procedures covering the work, administrative and work practice controls, etc.~~
- ~~—Describe the length of time the condition has existed.~~
- ~~—Identify any monitoring or condition assessment work that has been implemented and the results of these efforts.~~
- ~~—Determine what personal protective equipment was required and if utilized.~~
- ~~—Identify all personnel involved in the issue (participants, witnesses, etc.) and the extent of their involvement (or for hazardous events, their exposure to the hazard).~~
- ~~—For health or safety concerns, determine if injuries or illnesses have occurred.~~
- ~~—Describe corrective measures, if any, taken to date.~~
- ~~—Gather any other relevant information necessary to investigate the concern.~~

~~Appendix E~~

~~List of ECP Officer and Coordinators~~

~~Employee Concern Officer:~~

~~Lois Bender (703) 218-4471 9302 Lee Highway
Suite 950
Fairfax, Virginia 22031~~

~~Project ECP Hotline: (24 Hour recording) 800-XXX-XXXX (during Phase IB only)~~

~~ECP Coordinators:~~

Organization/ Area Served	Name	Phone #	Mail Address
BNFL/SAIC/Others Hanford Area	E.M. Akre	(509) 376-7047	1835 Terminal Drive Suite 220 Richland, WA 99352
BNFL (BEL) Manchester, U.K.	Phase IB Only		
GTSD Columbia, MD	Phase IB Only		
BNL San Francisco, CA	Phase IB Only		
SRTC Aiken, SC	Phase IB Only		

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